

### REMARKS

Favorable reconsideration and allowance of the claims of the present application, as amended, is respectfully requested.

In the present Office Action, which constitutes a FINAL REJECTION, the Examiner rejected Claims 1-2, 7-9, 11-13, 17-19, 21-23, 28-30, 32 and 57 under 35 U.S.C. §102(b) as allegedly being anticipated by Yahoo Screen Pages (dated 10/05/99) pp.1-5,

<http://web.archive.org/web/19991005031700/http://dir.yahoo.com/Arts/Artists/Masters/Directories/> ("Yahoo").

The Examiner further finally rejected Claims 33-34, 37-42, 45-50, 53-56 and 58 under 35 U.S.C. §103(a) as allegedly being unpatentable over Yahoo in view of US Patent No. 5,806,077 to Wecker ("Wecker").

The Examiner further finally rejected Claims 3-4, 10, 14-15, 20, 24-25 and 31 under 35 U.S.C. §103(a) as allegedly being unpatentable over Yahoo in view of a reference entitled "Privacy Compliance Resources, "Cookies" (dated 2/11/01), pp. 1, [http://web.archive.org/web/20010210192514/http://www.idcide.com/pages/res\\_term.htm](http://web.archive.org/web/20010210192514/http://www.idcide.com/pages/res_term.htm) ("Cookies").

The Examiner further finally rejected Claims 35, 43 and 51 under 35 U.S.C. §103(a) as allegedly being unpatentable over Yahoo in view of Cookies and further in view of Wecker.

With respect to the rejection of independent Claims 1, 12 and 22, 33, 41, 49 and 57 as being anticipated by Yahoo, applicants respectfully disagree in view of the clarifying amendments made to each of these claims. That is, each of independent claims

1, 12 and 22, 33, 41, 49 and 57 have been clarified to set forth a Web site navigation trail breadcrumbing solution that addresses the deficiencies of "hard-coded" breadcrumbing methods where the breadcrumbs (i.e., HTML links) may not accurately reflect correct order, link name and associated web pages for the navigation structure through the information space of a Website. That is, in order to correctly reflect the user's navigation through the Website's information space, breadcrumbs must be generated, maintained and updated as the Website changes, i.e., changes occurring in the web page organization including renaming, deleting, adding and moving web pages within the Website. A deficiency of the server-side breadcrumbing is that such an implementation places an inordinate load on the server in terms of execution time and storage space required to satisfy all user requests for web pages utilizing breadcrumbs.

Thus, the present invention as claimed in amended Claims 1, 12, 22, 33, 41, 49, 57 and 58 includes new limitation setting forth the functionality (e.g., see specification Tables 2-4) for generating, storing and dynamically updating, at the client, the stored breadcrumbs with the generated breadcrumb to form a breadcrumb navigation trail of breadcrumbs associated with navigation of the web pages visited at the Website without downloading from said web server any information describing a web page's location in a web site hierarchy. It is respectfully requested that this amendment does not constitute new matter or raise new issues as the claims of the invention are directed to a client-side breadcrumbing solution, pure and simple, and further set forth limiting features for clarification purposes. For example, support of the limitations added to Claims 1, 12, 22 and 57, can be found in the methodology depicted in Figure 2 (and code depicted in Table 2) of the specification and at line 7, page 10 to line 6, page 11, where it

is described how a function call `update_breadcrumb_navigation_trail( )`, executed at the client, includes arguments including `document.forms[0].bctitle.value` and `document.location` that generates the breadcrumb in the breadcrumb navigation trail. Respectfully, this is performed without downloading from the web server any information describing a web page's location in a web site hierarchy. Claims 7-9 and 28-30 are being further amended in view of the amendments to respective Claims 1 and 22 to characterize the updating step as dynamic.

Applicants respectfully submit that the cited and applied "Yahoo" reference does not teach or suggest a breadcrumbing solution being performed entirely on the client side as in the present invention. The yahoo reference shows how mere hardcoded HTML downloaded from the web server could generate navigation links. The hardcoded HTML would have to be maintained by hand by the web page provider and updated to reflect changes in the web page hierarchy any time that hierarchy changed. Moreover, the cited Yahoo reference neither teaches nor suggests the implementation of a breadcrumbing engine that is embedded in the web page, and that performs all the work of collecting the breadcrumbs on the client side such that no work has to be done to collect, store or send the breadcrumb information on the server side.

Rather, in operation, the present invention dynamically determines the navigation trail from the information it has stored in cookies from the previous page visits up to and including a current page, without any additional information or HTML code in the web page itself. In the prior art solutions, the HTML code to generate the navigation would have to maintained by hand by the web page provider and every time the relationship between the pages on the web site changed that HTML code would have to

change correspondingly, whereas the present invention determines the relationships between the pages (i.e., dynamically updates) as the web browser visits them.

For these reasons, the Examiner is respectfully requested to withdraw the rejection of amended independent Claims 1, 12, 22 and 57 and all claims dependent directly or indirectly dependent thereon.

With respect to the rejection of independent Claims 33, 41, 49 and 58 as being anticipated by Yahoo in view of Wecker, applicants respectfully disagree for the aforementioned reasons- including the additional reason that Wecker shows a hard-coded solution whereby hardcoded javascript variables along with javascript code is used to write the hardcoded javascript information into cookies and then retrieve it from the cookies to display the navigation. The hardcoded javascript variables would have to be maintained by hand by the web page provider and updated to reflect changes in the web page hierarchy any time that hierarchy changed.

In the present invention, the ONLY thing downloaded from the web server apart from the web page itself is the javascript breadcrumb engine. No other data, which describes the current page's place in the web site hierarchy, needs to be downloaded in the web page. There is no need to maintain any information about the relationships/relationships of the web pages (by hand) inside of the web pages themselves to be used by the breadcrumb engine. This is all performed by the javascript breadcrumb engine on the client side using cookies once the breadcrumb engine is delivered by the web page to the web browser.

For these reasons, the Examiner is respectfully requested to withdraw the rejection of amended independent Claims 33, 41, 49 and 58 and all claims dependent

directly or indirectly dependent thereon.

Moreover, the applied "Cookies" reference and unapplied Whitewater reference "Breadcrumbing using cookies" are of no help. For example, Whitewater's reference "Breadcrumbing using cookies" provides an example prior art solution that, even though it is in javascript, it requires hardcoded data that is maintained on the server to be downloaded to the web browser, apart from the part which actually "generates" the visible navigation. The JS variables levelnumber, pagename and pageurl are "hardcoded" in this example to "set the breadcrumbing". This means these variables would have to be each hand coded and maintained by the web page provider on each page, each page with their own actual values to designate the page's place in the navigation.

Contrarily, the present invention does not depend on any such hand coded information, all it depends on is the engine itself being downloaded from the server. That is, respectfully, the system and method of the present invention as claimed is not relying on the breadcrumbs being downloaded from the server; rather, the breadcrumbs are dynamically generated/stored on the client side.

In view of the foregoing amendments and remarks, this application is now believed to be in condition for allowance, and a Notice of Allowance is respectfully requested. If the Examiner believes a telephone conference might expedite prosecution of this case, it is respectfully requested that he call applicant's attorney at (516) 742-4343.

Respectfully submitted,



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